

**REMARKS**

Claims 1-37 are pending in this application. By this Amendment, the specification and claims 1-3, 15, 26-34, 36 and 37 are amended. No new matter is added. Support for these amendments can be found at least at paragraphs [0034]-[0037]. Reconsideration based on the above amendments and following remarks is respectfully requested.

**I. The Specification Meets All Formalities**

The Office Action objects to the specification, because the term "beyond fields" is present in paragraphs [0001] and [0032]. Accordingly, the specification is amended at paragraphs [0001] and [0032] to replace "beyond fields " with "across fields." Withdrawal of this objection is respectfully requested.

The Office Action also objects to the specification, because paragraphs [0034]-[0035], were not rewritten to overcome the objection in the February 17, 2004 Office Action. Accordingly, the specification is amended by amending paragraph [0034] and deleting paragraph [0035], so as to combine paragraphs [0034] and [0035] into a single paragraph to obviate this objection. Likewise, paragraph [0038] is amended and paragraphs [0039] and [0040] are deleted. Withdrawal of this objection is respectfully requested.

**II. The Claims Define Patentable Subject Matter**

The Office Action rejects claims 1-3, 15 and 27-31 under 35 U.S.C. §103(a) as being obvious over U.S. Patent No. 5,632,022 to Warren et al. ("Warren") in view of U.S. Patent No. 5,808,914 to Shin et al. ("Shin") and further in view of U.S. Patent No. 6,556,983 to Altschuler et al. ("Altschuler"); claims 26 and 36-37 under 35 U.S.C. §103(a) as being obvious over Warren in view of Altschuler; claim 32 under 35 U.S.C. §103(a) as being obvious over Warren in view of Shin; and claims 33-34 under 35 U.S.C. §103(a) as being obvious over Warren in view of Shin and further in view of U.S. Patent No. 4,595,982 to Burt. The rejections are respectfully traversed.

None of the applied references teach, suggest or disclose an apparatus or an automated process classification method that includes the feature, "wherein epistemological grounds includes constraint information concerning definitions of the activity, resource and the dependence relationship, and sets a purpose or a course of the process to be described on the basis of the domain," as recited in claim 1, and similarly recited in independent claims 2, 3, 15, 26-34, 36 and 37.

**A. Warren**

Warren discloses a method of collecting software components in a form of an encyclopedia. The term "encyclopedia" in Warren relates to a software component database that a software engineer can use to retrieve reusable tools and parts through a graphical hypertext user interface (col. 4, lines 9-27). This "encyclopedia" provides a software engineer with the appropriate background knowledge by representing and containing knowledge about software. Further, Warren merely uses the term "epistemological grounds." as a metaphor, to which Warren compares background knowledge (col. 6, lines 44-45). Thus, the term "epistemological grounds" recited by Warren is different from the claimed "epistemological grounds" as it neither defines methods of classifying processes, activities, and resources, nor constrains descriptions as recited in claim 1, and similarly recited in the other independent claims.

Further, Warren's encyclopedia does not allow a "purpose or a course of process to be described on basis of the domain," as recited in claim 1 and in the independent claims. Instead, Warren discloses a method premised on the establishment of a unified classification structure. In other words, Warren does not allow a purpose of the process to be described or a course of the process to be described to be set explicitly based on the domain in the description or constraint information with respect to constituent components which are used in the process to be described. Thus, Warren's encyclopedia is different from the claimed

"epistemological grounds" as it does not enable the description of a single phenomenon as a plurality of processes for each analysis viewpoint. Thus, Warren does not disclose the epistemological grounds that "sets a purpose or a course of the process to be described on the basis of the domain," as recited in claim 1, and similarly recited in the other independent claims.

**B. Shin**

The Office Action asserts on page 7 and similarly on pages 19, 24, 28, 32, 36, etc., that Warren does not disclose the "end conditions," as recited in claim 1 and similarly recited in claims 2, 3, 15, 27-31 and 32-34. The Office Action further asserts that Shin makes up for this deficiency. Applicants respectfully disagree with this assertion.

Contrary to the Office Action's assertions, Shin discloses a program to obtain an optimum layout for a table to be displayed, when texts, connectors and common constraint conditions are given as initial information (Fig. 1). The program disclosed in Shin makes use of the common constraint conditions given as initial information. In contrast, the claimed end condition that is defined in epistemological grounds is used for a description of processes. Thus, the common constraint conditions disclosed in Shin is different from the claimed end condition. Thus, Shin does not disclose this feature as recited in claim 1, and similarly recited in the independent claims.

**C. Atschuler**

The Office Action asserts on page 7, and similarly on pages 13, 19, 24, 28, 32, 36, etc., that Warren does not explicitly disclose the E-R model, as recited in claim 1 and similarly in recited in claims 2, 3, 15, 27-31, 36 and 37. The Office Action further asserts that Warren does not disclose the cluster relationship, as recited in claim 26. The Office Action further asserts that Altschuler makes up for these deficiencies. Applicants respectfully disagree with these assertions.

Contrary to the Office Action's assertion, Altschuler discloses diagrams that include an "entity," such as a person, organization, name and the like, and links (col. 13, lines 31-53). However, Altschuler does not disclose the claimed E-R model which has entities and links relating entities to each other. Further, the claimed E-R model allows relationships among entities, i.e., objects to be described as data, to be analyzed in the form of a diagram.

Conversely, Altschuler does not disclose this unique relationship. Altschuler, as shown in Fig. 3, discloses a bifurcation at a link from "WORKS IN A" to "ORGANIZATION" to point "JOB TITLE." Thus, this bifurcating point is an impairment in analyzing links among entities, and thus, a unique relationship cannot be established on the link having such a bifurcating point. Thus, the entity-relationship model recited in Altschuler is not the claimed E-R model.

Further, Altschuler does not disclose "managing a cluster relationship proper to each filed and the classification structures as attributes of a global epistemological ground," as recited in claim 26.

At least for the reasons set forth herein, claims 1-3, 15 and 27-31 and their respective dependent claims, would not have been rendered obvious by Warren in view of Shin and further in view of Altschuler.

At least for the reasons set forth herein, claims 26 and 36-37 would not have been rendered obvious by Warren in view of Altschuler.

At least for the reasons set forth above, claim 32 would not have been rendered obvious by Warren in view of Shin.

At least for the reasons set forth above, claims 33-34 would not have been rendered obvious by Warren et al. in view of Shin et al. in view of Altschuler and further in view of Burt.

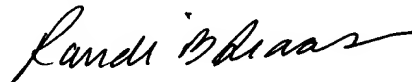
Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

**III. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1-37 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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